

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

-----X	X	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Criminal No. 1:19-cr-10080-NMG
GREGORY COLBURN, ET AL,	:	
	:	
Defendants.	:	
	:	
-----X	X	

**NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA’S  
ASSENTED TO MOTION FOR LEAVE TO FILE A RESPONSE TO DEFENDANT  
JOHN WILSON’S SEALED SUR-REPLY**

Nonparty University of Southern California (“USC”) hereby moves the Court for leave to file a Response to Defendant John Wilson’s Sealed Sur-Reply in Opposition to USC’s Motion to Quash [ECF No. 1357]. As grounds for this Motion, USC states as follows:

1. Wilson’s Sur-Reply references new documents and includes various factual inaccuracies, which USC seeks to correct; and
2. USC seeks to file on or before November 5, 2020 to allow it sufficient time to prepare the Response while it prepares responses to two other motions to compel from various defendants.

**WHEREFORE**, USC respectfully requests that this Court allow it leave to file its Response under seal.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel conferred with counsel for Defendant John Wilson who assents to USC filing its Response under seal.

Respectfully submitted,  
UNIVERSITY OF SOUTHERN CALIFORNIA,  
By its attorneys,

/s/ Debra Wong Yang

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Dated: October 27, 2020

**CERTIFICATE OF SERVICE**

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on October 27, 2020.

/s/ Anthony E. Fuller

Anthony E. Fuller